



New Jersey Council of County Vocational-Technical Schools

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Career and Technical Education Code – NJAC 6A:19 Major Recommendations of the NJ Council of County Vocational-Technical Schools

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The proposed readoption of NJAC 6A:19, Career and Technical Education Programs and Standards is a positive step forward for career and technical education in New Jersey. The code contains many positive changes that will strengthen career and technical education in New Jersey. Most notably, the code will substantially increase accountability, enabling the Department of Education to meet its stated goal of targeting limited resources to high quality programs. It eliminates unnecessary language that has been perpetuated in the code for many years. And, by emphasizing integrated academics and earlier career education, it seeks to move career and technical education from the margins into the mainstream of public education policy and practice.

The NJ Council of County Vocational-Technical Schools strongly supports these elements of the proposed code, and we commend the Office of Vocational-Technical, Career and Innovative Programs for their comprehensive review of the code and willingness to propose extensive changes. While the overall direction is quite positive, the Council does have some important recommendations to clarify key elements of the code. We have already met with Rochelle Hendricks to discuss these specific suggestions and we appreciate this opportunity to share our recommendations with the State Board of Education.

1. **Access** – Ensuring students' right of access to county vocational-technical school programs is a paramount concern for New Jersey's county vocational-technical schools. The State Board of Education acted in 2001 to bring the code into alignment with the statute ensuring student access to county vocational school programs (NJSA 18A:54-20.1). Yet despite this important step, expensive legal challenges continue to proliferate. Most recently, the Appellate Division of Superior Court remanded a case that was already decided by the Commissioner and State Board back to the Commissioner for further review because the court could not clearly determine whether there was merit to a local district's challenge of their obligation to send students to the county vocational-technical school.

Such legal challenges are expensive and divisive, and they highlight the need to clarify the statute regarding access to county vocational schools with code language stating that students do not lose their right to attend their county vocational school if their district offers a similar program. The specific language we recommended is: Existence of a comparable career and technical education

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program in the local school district shall not negate a student's right to enroll in their resident county vocational school district."

In addition, the Council recommends changes to ensure that all students have access to information about county vocational programs and transportation even when their home district is on vacation, and more specific language ensuring the county vocational schools' right to provide information about their programs to all students, in grades k-12, particularly those in middle school

6A:19-[2.2]2.3 Access to county vocational school district ~~[career and technical education]~~ programs

- (a) Each local district board of education shall guarantee the right of all of its students to apply to and, if accepted, to attend a county vocational school district, in accordance with N.J.S.A. 18A:54-20.1a. and b. The sending school district shall be responsible for the tuition and transportation ~~[costs]~~—for students admitted to a county vocational school district, in accordance with N.J.S.A. 18A:54-20.1a. Transportation services shall be provided on each day the county vocational school district is in session.
- (b) Existence of a comparable career and technical education program in the local school district shall not negate a student's right to enroll in their resident county vocational school district.
- ~~(bc)~~ A county vocational school district shall permit non-resident students to enroll in its approved programs of career and technical education under the following conditions:
 1. The resident district board of education or resident county vocational school district does not offer an identical type of approved program, having the same Classification of Instructional Programs (CIP) code, that meets or exceeds current program performance standards;
 2. The resident district board of education agrees to pay the tuition and provide transportation~~[costs]~~; and
 3. Space is available for additional enrollees in the approved programs offered by the receiving county vocational school district, pursuant to N.J.S.A. 54-20.1b.
- ~~(ed)~~ In accordance with ~~(bc)~~ above, county vocational school districts receiving students from a district board of education outside the county shall enter into written contractual agreements for estimated tuition rates not to exceed the limitations imposed by N.J.S.A. 18A:54-23.4; and, the method of determining tuition rates shall be that specified in N.J.A.C. 6A:23-3, Tuition Public Schools.
- ~~(de)~~ A county vocational school district shall admit resident students for enrollment in classes and provide instruction on the basis of student's application for admission, [and] their potential for achieving the academic and/or occupational objectives of the program, and the space available.~~acceptance.~~
- (e) A local district board of education shall provide the county vocational school district(s) and their designated representatives with reasonable opportunity, during school hours, to present information about the county vocational school

district(s) programs to all students in the school district in grades K through 12 including presentations to large group assemblies. No district board of education or its employees may ~~[otherwise]~~ inhibit student access to such information or otherwise restrict a county vocational school district's access to students, student data, or mailing lists.

2. **Clear differentiation between county vocational school districts and local districts offering vocational programs.** In seeking to eliminate from the code all language that is not clearly regulatory in nature, some important provisions regarding county vocational school programs (currently in sections 3.2, 3.3 and 3.4 of the code) were omitted, blurring the distinction between county vocational school districts and local districts. One of the Council's primary recommendations at the outset of the code review process was to address county vocational schools in a coherent manner that recognizes county vocational-technical schools as the primary (but not the only) delivery system for career and technical education. The county vocational schools were established in statute (NJSA 18A:54) to provide secondary and post-secondary vocational-technical education programs on a cost-effective regional basis. The statute recognizes that the operations and governance of county vocational-technical schools are distinct from regular high schools that offer vocational-technical education programs, and it charges the State Board of Education with prescribing specific rules for county vocational-technical schools. (NJSA 18A:54-21). Therefore, the Council recommends that a new subsection be created to deal specifically with county vocational schools and restore the language that is in 3.2, 3.3 and 3.4 of the current code.

6A:19-2.2 Delivery of career and technical education programs by county vocational school districts (restoration of existing lang. with new text in bold)

- (a) County vocational school district programs shall be based on unique circumstances governed by matters of **economic demand**, geography, program efficiencies, or the presence of specialized facilities integral to the offering of the program.
- (b) The county system for career and technical education shall include those secondary and postsecondary programs identified by the county board of vocational education as needed.
- (c) **Approval of county vocational school district programs shall be based upon satisfaction of the requirements under N.J.A.C. 6A:19-3.1. A county vocational school district shall be approved to operate or continue career and technical education programs within each career cluster as defined under N.J.A.C. 6A:19-1.2.**
- (d) The chief school administrator of the county vocational school district shall have complete responsibility, subject to the rules of the State Board of Education and the Commissioner, for a county vocational school district in those areas in which the county board of vocational education has direct responsibilities, and shall be directly responsible to a county board for vocational education.

3. **Program Approval Process and Standards** -The Council supports the program requirements included in NJAC 6A:19-3.1. We have long held the position that a rigorous process for approval of vocational-technical education programs is essential to ensure accountability for federal funds and to ensure students, parents, and employers of quality programs that prepare individuals for the jobs of today and tomorrow.

New Jersey's county vocational-technical schools have a long history of success in providing quality programs that fully address all of the proposed program requirements. Providing programs that directly respond to regional and statewide economic/labor needs is critical to our mission. Advisory committees composed of employers, labor representatives, teachers and others are a mainstay of our operations.

The program approval process for county vocational-technical schools should recognize their strong track record and permit them to be approved for a range of career and technical education programs within each of the 16 career clusters, rather than requiring them to undergo approval for multiple programs within a single career area. This is consistent with language in the current code that gives the county board of vocational-technical education the authority to determine which secondary and postsecondary programs are needed (NJAC 6A:19-3.4c). We recommend that this language be retained in the new code (see recommended 2.2b above). The code should specify that as the primary delivery system for career and technical education, county vocational-technical schools "shall be approved to operate or continue career and technical education programs within each career cluster" (see recommended 2.2c above).

4. **Structured Learning Experiences** – The proposal to shift the requirements for structured learning experience coordinators from the Licensure Code (NJAC 6A:9) to the Career and Technical Education Code (NJAC 6A:19) provides an opportunity to revisit the training requirements to ensure that they address the goals of protecting student health, safety, and program quality without imposing unreasonable bureaucratic requirements on schools and staff.

The code suggests that all high school students should be offered opportunities to participate in structured learning experiences. While this is a positive goal that will benefit students, it cannot be achieved if the state imposes overly burdensome training requirements on schools and teachers that place students in non-hazardous, unpaid structured learning experiences.

When it adopted the Phase 3 amendments to the Licensure Code in early 2005, the State Board took action to reduce the amount of training for structured learning experience coordinators and non-hazardous cooperative education coordinators, and to permit certified vocational teachers with this required training to also supervise students. The current code requires "a minimum of 20 hours of training or a Department-approved equivalent program in safety and health and required Department procedures and planning for SLEs" as well as training in child wage and labor laws as required by the state and federal departments of Labor. However, the training programs that are being offered to school districts go well beyond these requirements, to encompass 48 hours of training (see

attached). While the Council will be seeking approval for our own “equivalent program” that emphasizes content over seat time, we strongly recommend that the State Board and DOE revisit this issue to ensure that only the essential training is being required of school personnel.

In addition, the State Board must clarify exactly who is subject to the SLE training requirements. The Licensure Code references “structured learning experience coordinators” and the understanding at that time was that each school or district offering SLEs must have a coordinator to review SLEs for safety and educational integrity. The current code states that each district must ensure that students participating in SLEs are “supervised by school personnel” who meet the established training requirements. The Council recommends clarification at NJAC 6A:19-4.3 as follows:

- b. Each district board of education shall ensure that ~~[students participating in all]~~ other structured learning experiences, *i.e.*, other than apprenticeship training and cooperative education experiences, ~~[shall be supervised]~~ are coordinated by school personnel who are assigned by the chief school administrator of the employing district board of education and who meet the following requirements:
 - 1. Holds a standard instructional certificate;
 - 2. Presents evidence of one year of full-time, successful classroom teaching experience; and
 - 3. Completes the study requirements found at N.J.A.C. 6A:9-13.19(b)2i and ii, 13.20(b)2i and ii, or N.J.A.C. 6A:9-13.21(b)3i and ii.

In addition, the Council recommends that the following language be added at NJAC 6A:4.3e to clarify that school districts are not responsible for transporting students to/from SLEs.

- (e) Transportation of the student to and from the site of the structured learning experience shall be the responsibility of the student, unless otherwise required pursuant to NJAC 6A:14.

The Council appreciates this opportunity to present our recommendations regarding the Career and Technical Education Code to the State Board of Education. We have been working closely with Department of Education staff since before the code was introduced, and we are grateful for the opportunity to collaborate in achieving a regulatory structure that will enhance clarity and achieve an appropriate balance between flexibility and accountability.

STRUCTURED LEARNING EXPERIENCE TEACHER CERTIFICATION AND TRAINING INFORMATION

4. Two graduate level courses or a Department-approved program in the following required areas: one in the administration and supervision of vocational-technical education programs and one in industrial and labor relations.

(c) An emergency county apprenticeship coordinator certificate may be issued to a candidate who meets the requirements in (c)1 and 2 below. The candidate will have 12 months to complete the requirements for the standard certificate.

1. A standard instructional certificate with a vocational-technical education endorsement; and
2. Two years of teaching experience in a vocational-technical education program, or one year of successful teaching experience and completion of a formal apprenticeship.

PART 5: Information Regarding the Non-collegiate Training Requirements for All of the Above

The required non-collegiate training include the following five courses:

Structured Learning Experience Coordination Required Non-collegiate Courses	
Course Title	Hours
Designing and Implementing Student Training Plans	18 hours
OHSA 10 PLUS (<i>Worksite safety and health laws and regulations plus NJDOE student safety and health administrative code</i>)	12 hours
New Jersey State Child Labor Laws, Regulations, and Hazardous Orders	6 hours
New Jersey State Wage Payment and Wage and Hour Laws and Regulations	6 hours
Federal Wage and Hour and Child Labor Laws, Regulations, and Hazardous Orders	6 hours
Total of 5 Courses	Total of 48 hours

\$225
\$150
\$75
\$75
\$75

Sign up for announcements of the required non-collegiate courses by subscribing to the vocinfo e-mail newslst at the following website: <http://www.nj.gov/njded/voc/>. Courses are offered year-round and throughout the state. For schedules and to register for non-collegiate courses, please visit: <http://eohsi.rutgers.edu/ss/sched1.html>.

PART 6: Requirements for Graduate Courses for Cooperative Education Coordinator Certificates, Hazardous and Non-hazardous Occupations

The two graduate courses are required to obtain the cooperative education coordinator - hazardous occupations and the cooperative education coordinator - non-hazardous occupations certificates, one each in the following topic areas: career/vocational guidance and counseling and the principals of work-based